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February 11, 2022

VIA ECF AND E-MAIL (TSCRIVO@OSLAW.COM)

Joshua B. Frank TEL: 2026397748 FAX: 2025851021 joshua.frank@bakerbotts.com

Special Master Thomas P. Scrivo O'Toole Scrivo, LLC 14 Village Park Road Cedar Grove, NJ 07009

Re: Occidental Chemical Corp. v. 21st Century Fox Am., Inc.

Civil Action No. 2:18-cv-11273-MCA-LDW

Agenda for February 16, 2022 Status Conference

Dear Special Master Scrivo:

I write on behalf of defendant Conopco, Inc. ("Conopco") to request that the scheduling of Conopco's 30(b)(6) deposition be addressed at the upcoming monthly status conference on Wednesday, February 16, 2022. Occidental Chemical Corporation's ("Occidental") to date has not agreed to move the deposition from March 8, 2022, which is rapidly approaching. Conopco briefed this issue in letters to the Special Master dated February 4 (ECF No. 1968) and February 8 (ECF No. 1973), and Occidental provided a response on February 8 (ECF No. 1972).

Conopco thanks you for your time and attention to this matter.

Sincerely,

Joshua B. Frank

Counsel for Conopco, Inc.

Johna B. Frank

Cc: All counsel of record (via ECF)